

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 23-20454-CR-BECERRA

UNITED STATES OF AMERICA

vs.

**CARL ALAN ZAGLIN,
ALDO NESTOR MARCHENA,
FRANCISCO ROBERTO COSENZA CENTENO,**

Defendants.

_____ /

JOINT MOTION TO CONTINUE TRIAL

The United States of America, by and through its undersigned counsel (the “Government”), and defendants Carl Alan Zaglin, Aldo Nestor Marchena, and Francisco Roberto Cosenza Centeno (the “Defendants”) jointly move the Court to continue the trial to September 2, 2025, and reset Calendar Call to August 25, 2025, or as soon thereafter as the Court’s schedule permits.¹

The parties hereby stipulate and agree: (i) that good cause exists to continue trial; (ii) that the time period from and including April 28, 2025, through on or about September 2, 2025, shall constitute excludable delay under the Speedy Trial Act; and (iii) that the delay is based on the interests of justice due to the need for time for the Defendants to review voluminous discovery and effectively prepare for trial taking into account the exercise of due diligence, as well as the review by the Department of Justice pursuant to the President’s February 10, 2025, Executive Order, both of which are in the interests of justice and outweigh the best interests of the public and the

¹ The undersigned understands that *United States v. Palacios Palacios, et al.*, 22-cr-20104-JB, is currently scheduled for trial beginning September 2, 2025. We request that this trial be scheduled as soon after as possible.

defendants in a speedy trial. *See* 18 U.S.C. § 3161(h)(7). In support of this motion, the parties state as follows:

On or about November 28, 2023, a grand jury in the Southern District of Florida returned a five-count Indictment alleging the Defendants participated in a sophisticated bribery and money laundering scheme from 2015 through approximately 2020. Dkt No. 1. Mr. Zaglin was arraigned on the Indictment and released on bond pending trial on or about December 20, 2023. *See* Dkt. No. 8. Mr. Cosenza was extradited from Honduras and had his initial appearance on or about April 5, 2024. Dkt. No. 38. He is out on bond. Mr. Marchena was extradited from Colombia and had his initial appearance on or about November 1, 2024. Dkt. No. 100. Mr. Marchena is in the custody of the Bureau of Prisons serving a sentence in a separate case. *See United States v. Marchena*, 19-CR-20622. Calendar Call in this matter is currently set for April 1, 2025, and trial is set for April 28, 2025. Dkt. No. 109.

As the Court is aware, this matter is undergoing priority review by the Department of Justice pursuant to the President's February 10, 2025, Executive Order (Exec. Order No. 14,209, 90 Fed. Reg. 9, 587 (Feb. 14, 2025)).

In addition, discovery in this case is voluminous. The Government has produced over 4.5 million pages of discovery, most recently producing approximately 1.4 million pages of data from a cell phone that it obtained in late 2024, which was released to the Government in February 2025 after filter review. The Government is also preparing additional data for production. Specifically, the Government is preparing for production: (1) a portion of a laptop from a former Atlanco employee that was released from filter review on March 17, 2025; (2) a reproduction of a laptop that the Government obtained in January 2025; and (3) records in response to discovery requests

made by Mr. Zaglin in February 2025. The Defendants need additional time to review the discovery and prepare for trial.

The proposed trial date of September 2, 2025, is based on the 60-day continuance proposed by the Government and additional time to accommodate the Defendants' counsels' schedules. The Government and Defendants therefore jointly move the Court to continue trial to September 2, 2025, reset Calendar Call to August 25, 2025, or as soon thereafter as the Court's schedule permits. The parties also move for an order that all time from April 28, 2025, through September 2, 2025, be excluded for purposes of the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A).²

Respectfully submitted,

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² Defendant Zaglin consents to the proposed continuance. However, Mr. Zaglin maintains that, by consenting to the proposed continuance, he does not waive or relinquish the relief which he has requested pursuant to the President of the United States' February 10, 2025, Executive Order concerning cases under the Foreign Corrupt Practices Act of dismissal of this action without prejudice pending ultimate dismissal with prejudice, and that he will continue to advocate to the United States Department of Justice at the highest levels pursuant to this purpose. *See* Exec. Order No. 14209, 90 F.R. 9587 (Feb. 10, 2025).

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